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February 15, 2018

Filed Electronically Via ECFS

Ms. Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

RE: EB Docket No. 06-36, Annual 47 C.F.R. § 64.2009 (e) CPNI Certification Filing for Colorado Valley Communications, Inc. d/b/a Colorado Valley Long Distance, Inc.

Dear Ms. Dortch:

On Wednesday, February 14, 2018, Colorado Valley Communications, Inc. d/b/a Colorado Valley Long Distance, Inc. ("Colorado Valley") filed its CPNI Compliance Certificate. It was subsequently discovered the affiliate's certificate was filed under Colorado Valley Communications' name. Enclosed is the corrected CPNI Compliance Certificate of Colorado Valley Communications, (499 Filer ID No. 823570) for 2017 along with the accompanying Statement of Compliance and Procedures.

Please contact me at 979-242-5911 or <u>kareng@coloradovalley.com</u> with any questions or concerns.

Sincerely,

Karen Gunkel

Regulatory Affairs Manager

Colorado Valley Communications, Inc. d/b/a Colorado Valley Long Distance, Inc.

cc: Best Copy and Printing, Inc. (BCPI), fcc@bcpiweb.com

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Annual 47 C.F.R. § 64.2009 (e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2017

1. Date filed: February 14, 2018

2. Name of Company: Colorado Valley Communications, Inc. d/b/a Colorado Valley Long Distance, Inc.

3. Form 499 Filer ID: 823570

4. Name of signatory: Kelly Allison

5. Title of signatory: President

6. Certification:

I, Kelly Allison, certify that I am an officer of the Company named above, and acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq*.

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure the Company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, safeguards, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq*. of the Commission's rules (See attached Statement of Compliance).

The Company has not taken any actions (i.e., proceedings instituted or petitions filed by the Company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. The Company does not have any information that pretexters have attempted to gain access to CPNI.

The Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI. Further, there has been no unauthorized access, disclosure to unauthorized individuals or instances of improper access to online information by individuals not authorized to view CPNI during the past year.

The Company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17, which requires truthful and accurate statements to the Commission. The Cooperative also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed:

Kelly Allison, President

Attachment: Accompanying Statement of CPNI Compliance and Procedures

COLORADO VALLEY COMMUNICATIONS, INC. d/b/a COLORADO VALLEY LONG DISTANCE, INC.

STATEMENT OF COMPLIANCE and PROCEDURES

For Year Ending 2017 Form 499 Filer ID: 823570

- 1. This Statement of Compliance for Colorado Valley Communications, Inc. d/b/a Colorado Valley Long Distance, Inc. ("Colorado Valley Communications" or "the Company") is attached to and referenced within the Company's 2017 Annual CPNI Certification.
- 2. Colorado Valley Communications has conducted CPNI training for all of its employees with special emphasis training for any employee that has access to CPNI. All employees have acknowledged their understanding of the requirements for the safeguarding of CPNI and the disciplinary actions that will be taken for the unauthorized access, breach, release or usage of CPNI.
- 3. The Company has and maintains copies of the FCC's CPNI Rules in addition to its own internal CPNI Policies and Guidelines (CPNI Manual). The CPNI Manual is fully compliant with FCC CPNI rules and must be reviewed and acknowledged by all Company employees.
- 4. For year ending 2017, Colorado Valley Communications is not aware of any incidence involving the access, breach, release or usage of its CPNI by any unauthorized person or entity; *i.e.*, data broker or pretexter.
- 5. For year ending 2017, Colorado Valley Communications has not received any customer complaints concerning the unauthorized access, breach, release or usage of CPNI.